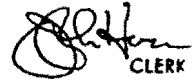


UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH DAKOTA  
SOUTHERN DIVISION

**FILED**

AUG 10 2015

  
CLERK

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UNITED STATES OF AMERICA,

CR15-40075

Plaintiff,

FACTUAL BASIS STATEMENT

vs.

BENJAMIN LYLE IVERSON,

Defendant.

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The undersigned parties stipulate that the following facts are true and establish a factual basis for the plea in the action pursuant to Federal Rules of Criminal Procedure 11(b)(3):

On April 11, 2015, the defendant, Benjamin Iverson, sent an electronic mail via his telephone to a law enforcement officer posing as an individual offering various sex acts with a 15-year-old minor for money as part of a sting operation. The electronic mail contained the name of a fictional minor and was sent to solicit the undercover officer to cause the minor under his control to engage in an illegal sex act with the Defendant. Defendant was 25 years of age at the time. The sex act solicited was that the female minor perform oral sex on the Defendant, which would have violated SDCL 22-22-7 Sexual Contact with a Child Under Sixteen Years of Age. All of this was in violation of 18 U.S.C. Section 2425.

RANDOLPH J. SEILER  
ACTING UNITED STATES ATTORNEY

August 10, 2015  
Date

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8-6-15  
Date

Benjamin Lyle Iverson  
Benjamin Lyle Iverson  
Defendant

8/6/15  
Date

Jason Tupman  
Jason Tupman  
Attorney for Defendant